

## **I. Drawings**

Applicants will submit formal drawings rendered in black and white at the time of Allowance.

## **II. Election of Claims**

Applicants affirm the election of Group I, without traverse.

## **III. Claims Rejected Under 35 U.S.C. § 103**

Claims 1, 2, 6 and 7 stand rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 5,801,702 issued to Dolan et al (hereinafter "Dolan") in view of U.S. Patent Number 5,911,145 issued to Arora et al (hereinafter "Arora"). Applicants respectfully disagree for the following reasons.

In order to establish a *prima facie* case of obviousness, the Examiner must show that each of the elements of a claim are taught or suggested by the combined references. Claims 1 and 6 include the elements of "a web page having a link to a sister site that permits simplified navigation" and "serving pages from the sister site responsive to actuation of the link." The Examiner states on page 4 of Paper No. 5, that Dolan teaches providing a link to access a sister site that permits simplified navigation citing Figure 8c and col. 18, lines 18-35 of Dolan. However, this figure and section of Dolan teaches generating a graphical tree structure as part of a user interface by parsing the HTML of a web page and cataloging the link information contained therein. See Dolan Abstract. This information is stored in the local memory of the machine running the network client that displays the user interface. See Dolan col. 8 lines 13-29 and Figure 3. Thus, Dolan does not teach a web page having a link to a sister site that permits simplified navigation. Rather, Dolan teaches a locally stored graph of links. Applicants have

been unable to discern any part of Dolan that teaches a sister site to provide simplified navigation.

Further, the Examiner admits that Dolan does not teach or suggest a web page that provides links to a sister site. This statement seems to contradict the Examiner's assertions that Dolan teaches providing links for accessing a sister site. Also, the Examiner states that Dolan teaches serving pages from a sister site in response to actuation of a link, citing col. 18 lines 18-35. However, this section of Dolan teaches parsing an HTML document retrieved after that document is selected from the graph that Dolan creates on the fly. See Dolan col. 18 lines 8-20. If the Examiner maintains this rejection it is requested that the examiner more clearly indicate what part of Dolan teaches serving pages from a sister site in response to the actuation of a link on a web page. In this connection, applicant notes that for "sister site" to have meaning there must be a primary site (i.e., not a sister site) associated therewith and not providing the simplified navigation. Therefore, pages served from the sister site are necessarily different than corresponding pages served from the primary site. Thus, it is requested that the Examiner specifically point out where in the cited references such aspects are addressed. Thus, Dolan does not teach or suggest each of the elements of claims 1 and 6.

Arora does not cure the defects of Dolan. The Examiner relies on Aurora to teach a website containing links to a sister site, citing only Figure 4 and reference numbers 470 and 474. However, Arora teaches a web site hierarchy editor. See Arora Abstract. Thus, Figure 4 is a display of a website hierarchy and reference numbers 470 and 472 label newly added pages to that hierarchy. See Arora col. 6 lines 44-51. The Examiner has not identified and Applicants have

been unable to discern any part of Arora that teaches that the web site illustrated in figure 4 and specifically pages 470 and 472 include or represent links to a sister site.

As an additional matter, Applicants are unable to discern any reasonably basis why one of ordinary skill would seek to combine the teachings of Dolan which relate to the parsing of web pages during navigation to create a hierarchical graph of where the user has been with the teaching of Arora that teaches drag and drop web page design. Rather, Applicants believe that these references are combined piece meal in an effort, guided by hindsight, to assemble the elements of the claims. Applicants note that the Examiner's asserted motivation for combining these references does not provides a justification why one of ordinary skill in the art would combine a user interface for a network client with an editor for web site management. Therefore, Dolan and Arora cannot be combined to teach or suggest each of the elements of claims 1 and 6. Accordingly, reconsideration and withdrawal of the obviousness rejection of claims 1 and 6 are requested.

In regard to claims 2 and 7, these claims include the elements of "accepting an alpha numeric indication of a navigation option to be followed" and "serving a matrix layer corresponding to the navigation option." The Examiner admits that Dolan does not teach these elements of claims 2 and 7. The Examiner relies on Arora to teach these elements of the claims. Specifically, the Examiner states that icon 350 and pop up window 326 as illustrated in figure 3 of Arora teach the elements of accepting an alpha numeric input corresponding to a navigation option. Paper No. 5, page 4. However, pop up window 326 merely accepts input for a label associated with the icon 350. See Arora col. 6 lines 28-30. Inputting a name for the icon 350 is not equivalent to accepting an indication of a navigation option to be followed. Rather, this

action labels a web page with a name. This name of a page or node in a web site is displayed when the page is accessed, typically at the top of the browser, if at all. The name does not function as a navigation point. Further, Applicants have reviewed the cited section of Arora that the Examiner indicates teaches serving a matrix layer corresponding to a navigation option. However, Applicants have been unable to discern any part of the cited section of Arora that teaches that the table depicted in figure 40 corresponds to icon 350 or properties window 326 which the Examiner has indicated are the navigation options taught by Arora. Therefore, the combination Dolan and Arora fails to teach or suggest each of the elements of claims 2 and 7. Accordingly, reconsideration and withdrawal of the obviousness rejection of claims 2 and 7 are requested.

Claims 3-5 and 8-10 stand rejected under 35 U.S.C. §103 as being obvious over Dolan in view of Arora and in further view of U.S. Patent No. 6,418,441 issued to Call (hereinafter "Call"). Claims 3 and 8 depend from independent claims 1 and 6 respectively and incorporate the limitations thereof. Thus, at least for the reasons mentioned in regard to claims 1 and 6, claims 3 and 8 are not obvious over Dolan and Arora. Further, claims 3 and 8 include the elements of transcoding an HTML page into an XML page. The Examiner admits that Dolan and Arora fail to teach these elements of claims 3 and 8. The Examiner cites col. 24, lines 10-30 of Call as teaching transcoding HTML to XML. However, Applicants have reviewed this section of Call and have been unable to discern any part that teaches such transcoding. Rather, Call teaches transforming XML data into HTML documents, but not the converse. See Call col. 24 lines 12-16. Therefore, Dolan, in view of Arora and Call does not teach each of the elements of claims 3 and 8. Accordingly reconsideration and withdrawal of the obviousness rejection of claims 3 and 8 are requested.

In regard to claims 4, 5, 9 and 10, these claims depend from claims 3 and 8 respectively and incorporate the limitations thereof. Thus, at least for the reasons mentioned in regard to